RESPONSE TO COMMENTS
Modification of General NPDES Permit No. AKG-31-0000

Comment: The U.S. Department of the Interior/Fish and Wildlife Service comments that the draft permit states that low phosphate detergents shall be included in the Best Management Practices (BMP) plan for domestic wastewater discharges. They also state that the surfactant properties of detergents would tend to disperse cooking oils sheen which is used as an indicator of hydrocarbon discharge, and work contrary to detections of violations of Alaska Water Quality Standards.

Response: Domestic wastewater discharge sources are sinks, showers, laundries, safety showers, eye wash stations, and galleys. Some of these sources involve the use of detergents as a normal course of business. The requirement to use low phosphate detergents in the BMP is to reduce nutrient loading to tundra wetlands and ponds thereby minimizing eutrophication potentials. The discharge of emulsified vegetable based cooking oils is not considered a problem. The no sheen monitoring requirement is intended to document the prohibition in Part II.B.1.c. of the permit that no spent cooking oils are discharged with the domestic wastewater.

Comment: The U.S. Department of the Interior/Fish and Wildlife Service comments that the effluent limitation for oil, grease, and hydrocarbons in the draft permit is "no visible sheen." They recommend the use of the effluent limitations contained in Alaska State General Permit No. 9440-DB003 for total aromatic hydrocarbons and total aqueous hydrocarbons, 10 µg/l and 15 µg/l respectively. Additionally, they recommend the use of the monitoring frequency for hydrostatic test water contained in the state permit which follows: "For test water from a pipe, one sample shall be collected for each 1,000 feet of the pipe hydrotested. Sampling shall be conducted in such a manner as to obtain a sample representative of the discharge of each 1,000 foot section of pipe. One sample shall be taken which is representative of the last 1,000 gallons of the discharge. A minimum of one sample shall be taken. For test water from tanks, a minimum of two samples shall be taken, one representative of each the first and last 1,000 gallons discharged."

Response: The "no visible sheen" criterion is used as an effluent limitation and monitoring requirement for the gravel pit water and the hydrostatic test water discharges. The potential presence of petroleum hydrocarbons in the gravel pit water would be considered incidental and resulting from heavy equipment leaking lubricating or hydraulic oils. These oils do not generally contain aromatic hydrocarbons.

The hydrostatic test water discharge is intended to cover the testing of new pipelines only and therefore crude oil hydrocarbons should not be present. The only hydrocarbons source present might be petroleum-based coatings on the pipe. Current practices of the North Slope operators do not include the discharge of hydrostatic test water from pipelines that have been previously used to transport crude oil. Because of

this fact, the conditions in the permit are not as stringent as those in the state general permit cited which was written primarily for repair operations on existing pipelines. To ensure that this permit is not used in the future to allow discharges associated with repair operations a prohibition to that effect will be added to the final permit.

Comment: The U.S. Department of the Interior/Fish and Wildlife Service comments that the monitoring requirements for all discharges to open water should likewise apply to tundra wetlands discharges.

Response: The sanitary and domestic wastewater discharges do require monitoring whether the discharge is to open water or the tundra. The gravel pit dewatering, construction dewatering, and hydrostatic test water discharges require monitoring for open water only and rely on BMPs to ensure that discharges meet the water quality based effluent limits. EPA believes this is the best approach to ensure compliance with the effluent limits for these discharges since at times these wastewaters will be used for secondary purposes, such as ice road construction and road watering, and it is not possible to obtain representative samples.

BMPs are intended to complement and augment effluent limitations. BMPs are inherently pollution prevention practices and have traditionally focused on good housekeeping measures and good management techniques. The BMP plan required in the permit must be designed to meet the effluent limits whether the discharge is to open water or the tundra. The BMP plan must also be modified if it proves ineffective in meeting its goals. This is an enforceable condition of the permit.

Comment: The Alaska Department of Natural Resources comments that the term "territorial sea" is not clearly defined in the draft permit. They specifically ask whether the seaward boundary is measured in statute or nautical miles.

Response: The definition used in the draft permit is carried over from the "Development Document for Final Effluent Limitations Guidelines and Standards for the Coastal Subcategory of the Oil and Gas Extraction Point Source Category." This rule was promulgated by the EPA in October 1996. It would not be prudent legally to go beyond that definition in this permit.

Comment: BP Exploration comments that the draft permit does not specify the size of the mixing zone for chlorine when the sanitary discharge is to the tundra.

Response: The fact that the size of the mixing zone for chlorine was omitted for the sanitary discharge to the tundra was an oversight on the part of EPA. The state of Alaska's 401 certification of the general permit dated November 19, 1996 did specify the size of the mixing zone and the effluent limitations at the end-of-pipe. The size of the mixing zone will be included in the final permit when issued.